IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN MILWAUKEE DIVISION

ANDREW L. COLBORN,

Plaintiff,

VS.

Civil No.: 19-CV-484

NETFLIX, INC.; CHROME MEDIA LLC, F/K/A SYNTHESIS FILMS, LLC; LAURA RICCIARDI; AND MOIRA DEMOS,

Defendants.

NETFLIX, INC.'S MOTION TO DISMISS SECOND AMENDED COMPLAINT

Netflix, Inc., by its attorneys, moves the Court, pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss the Second Amended Complaint as against it with prejudice. This Motion is supported by the accompanying Memorandum and the Second Declaration of Matthew E. Kelley.

Dated: March 2, 2020 Respectfully submitted,

s/ James A. Friedman

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